



**PATRICK D. CROCKER**  
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February 25, 2014

Ms. Marlene H. Dortch, Commission Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

*Filed Electronically Via ECFS*

RE: PEG Bandwidth, LLC  
PEG Bandwidth DE, LLC, PEG Bandwidth DC, LLC, PEG Bandwidth IL, LLC, PEG  
Bandwidth IA, LLC, PEG Bandwidth LA, LLC, PEG Bandwidth MA, LLC, PEG  
Bandwidth MD, LLC, PEG Bandwidth MS, LLC, PEG Bandwidth NJ, LLC, PEG  
Bandwidth NY, LLC, PEG Bandwidth PA, LLC, PEG Bandwidth TX, LLC, PEG  
Bandwidth VA, LLC  
Customer Proprietary Network Information Certification  
EB Docket No. 06-36

Dear Ms. Dortch:

PEG Bandwidth, LLC, PEG Bandwidth DE, LLC, PEG Bandwidth DC, LLC, PEG Bandwidth IL, LLC, PEG Bandwidth IA, LLC, PEG Bandwidth LA, LLC, PEG Bandwidth MA, LLC, PEG Bandwidth MD, LLC, PEG Bandwidth MS, LLC, PEG Bandwidth NJ, LLC, PEG Bandwidth NY, LLC, PEG Bandwidth PA, LLC, PEG Bandwidth TX, LLC and PEG Bandwidth VA, LLC, by its undersigned attorneys, hereby submits its 2013 CPNI Compliance Certificate and Accompanying Statement certifying compliance with Section 64.2001 *et seq.* of the Commission's rules.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or [patrick@crockerlawfirm.com](mailto:patrick@crockerlawfirm.com).

Very truly yours,

CROCKER & CROCKER



Patrick D. Crocker  
PDC/tld

Enclosures

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013

Date filed: February 24, 2014

Name of Companies Covered by this Certification:

PEG Bandwidth, LLC  
PEG Bandwidth DE, LLC  
PEG Bandwidth DC, LLC  
PEG Bandwidth IL, LLC  
PEG Bandwidth IA, LLC  
PEG Bandwidth LA, LLC  
PEG Bandwidth MA, LLC  
PEG Bandwidth MD, LLC  
PEG Bandwidth MS, LLC  
PEG Bandwidth NJ, LLC  
PEG Bandwidth NY, LLC  
PEG Bandwidth PA, LLC  
PEG Bandwidth TX, LLC  
PEG Bandwidth VA, LLC

Form 499 Filer ID: 828744

Name of Signatory: Edgar DeLong

Title of Signatory: Chief Operating Officer

I, Edgar DeLong, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

This Certification is dated this 24<sup>th</sup> day of February, 2014.

  
\_\_\_\_\_  
Edgar DeLong

Chief Operating Officer

PEG Bandwidth, LLC

PEG Bandwidth DE, LLC

PEG Bandwidth DC, LLC

PEG Bandwidth IL, LLC

PEG Bandwidth IA, LLC

PEG Bandwidth LA, LLC

PEG Bandwidth MA, LLC

PEG Bandwidth MD, LLC

PEG Bandwidth MS, LLC

PEG Bandwidth NJ, LLC

PEG Bandwidth NY, LLC

PEG Bandwidth PA, LLC

PEG Bandwidth TX, LLC

PEG Bandwidth VA, LLC

## Customer Proprietary Network Information Certification Attachment A

PEG Bandwidth, LLC, PEG Bandwidth DE, LLC, PEG Bandwidth DC, LLC, PEG Bandwidth IL, LLC, PEG Bandwidth IA, LLC, PEG Bandwidth LA, LLC, PEG Bandwidth MA, LLC, PEG Bandwidth MD, LLC, PEG Bandwidth MS, LLC, PEG Bandwidth NJ, LLC, PEG Bandwidth NY, LLC, PEG Bandwidth PA, LLC, PEG Bandwidth TX, LLC, and PEG Bandwidth VA, LLC (hereinafter collectively, "PEG Bandwidth") have established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, ("Section 222") and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules.

PEG Bandwidth provides private line services to large carrier customers pursuant to ICB contracts and has no access to CPNI. PEG Bandwidth's customer contracts uniformly contain confidentiality agreements addressing customers' private information. PEG Bandwidth will not disclose CPNI except as where required by law.

### Safeguarding against pretexting

- PEG Bandwidth takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. PEG Bandwidth is committed to notifying the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

### Training and discipline

- PEG Bandwidth has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules. In the event PEG Bandwidth gains access to CPNI, PEG Bandwidth will train personnel as to when they are and are not authorized to use CPNI. PEG Bandwidth personnel failing to follow policies and procedures established by PEG Bandwidth protecting CPNI will be subject to a disciplinary process. PEG Bandwidth prohibits employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

### PEG Bandwidth use of CPNI

- Should PEG Bandwidth gain access to CPNI, PEG Bandwidth shall use such information only as authorized and required by law.
- PEG Bandwidth will not distribute such CPNI to third parties for their sales or marketing purposes nor will PEG Bandwidth share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors, or any other third party for the purpose of marketing any service.

- PEG Bandwidth does not share, sell, lease or otherwise provide CPNI to any third party. In the event PEG Bandwidth gains access to CPNI, PEG Bandwidth will not otherwise disclose CPNI to a third party except when required by a lawfully issued government subpoena.

#### Additional safeguards

- PEG Bandwidth will not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns using CPNI.
- PEG Bandwidth designates one or more officers, as an agent or agents of the PEG Bandwidth, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- PEG Bandwidth does not disclose CPNI over the phone and does not allow for online access to CPNI.
- In the event of a breach of CPNI, PEG Bandwidth will comply with all applicable breach notification laws.